

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FRANK CARBONE, ANDREW CORZO, SAVAN-
NAH ROSE EKLUND, SIA HENRY, ALEXANDER
LEO-GUERRA, MICHAEL MAERLENDER, BRAN-
DON PIYEVSKY, KARA SAFFRIN, and BRITTANY
TATIANA WEAVER, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA INSTITUTE
OF TECHNOLOGY, UNIVERSITY OF CHICAGO,
THE TRUSTEES OF COLUMBIA UNIVERSITY IN
THE CITY OF NEW YORK, CORNELL UNIVER-
SITY, TRUSTEES OF DARTMOUTH COLLEGE,
DUKE UNIVERSITY, EMORY UNIVERSITY,
GEORGETOWN UNIVERSITY, THE JOHNS HOP-
KINS UNIVERSITY, MASSACHUSETTS INSTITUTE
OF TECHNOLOGY, NORTHWESTERN UNIVER-
SITY, UNIVERSITY OF NOTRE DAME DU LAC,
THE TRUSTEES OF THE UNIVERSITY OF PENN-
SYLVANIA, WILLIAM MARSH RICE UNIVERSITY,
VANDERBILT UNIVERSITY, and YALE UNIVER-
SITY,

Defendants.

Case No. 1:22-cv-00125

**Hon. Matthew F. Kennelly
Magistrate Gabriel A. Fuentes**

JURY TRIAL DEMANDED

**DECLARATION OF ROBERT E. LITAN REGARDING TWO MINOR CORRECTIONS
TO EXHIBIT F FILED WITH PLAINTIFFS' OPPOSITION
TO DEFENDANTS' MOTION TO DISMISS**

I, Robert E. Litan, declare as follows:

1. I am a Shareholder of Berger Montague PC. I represent Plaintiffs in the above-entitled action.

2. On June 10, 2022, I submitted a Declaration attached to Plaintiffs' Memorandum of Law in Opposition to Defendants' Motions to Dismiss ("Plaintiffs' Memorandum") in the above-captioned matter. Attached to that Declaration was an Exhibit F containing a table showing if Defendants increased their annual spending rate from their unrestricted endowments from the current 4.5 percent annually to 6.5 percent, then 9 of the 17 Defendants need not charge anything at all to their current students on financial aid, while the net price at the 8 others would fall by an average of almost \$12,000 annually.

3. On June 12, 2022, I noticed there were two minor transcription errors in the numbers reported in the second column for CalTech and Columbia. The attached Corrected Exhibit F contains the correct numbers in that column. Neither of these corrections affect the data and calculations reported in the other columns for these universities in the original table, nor the implications of those calculations set forth in Plaintiffs' Memorandum.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 13th day of June, 2022.

/s/ Robert E. Litan